



United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

February 3, 2021

**VIA ECF**

The Honorable Andrew L. Carter, Jr.  
United States District Judge  
Southern District of New York  
United States Courthouse  
40 Foley Square  
New York, New York 10007

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC#: \_\_\_\_\_  
DATE FILED: 2/4/21

Re: United States v. Recio-Rondon, et al.,  
20 Cr. 115 (ALC)

Dear Judge Carter:

The Government writes on behalf of the parties to request an adjournment of the upcoming status conference, currently scheduled for February 4, 2021 at 12 PM, and exclusion of time under the Speedy Trial Act. As the Court is aware, defendant Cristian Valdez's pretrial motion, first filed on August 12, 2020, is fully briefed and pending before this Court. (See ECF Nos. 36, 37, 38, 39). Consequently, there are no new issues the Government or defense counsel intend to raise with the Court at the upcoming status conference. In light of the foregoing, all defendants, through counsel, have indicated that they are amenable to a thirty-day adjournment of the status conference. Likewise, the Government does not oppose a thirty-day adjournment under these circumstances.

Assuming the conference is rescheduled, the Government respectfully requests that the Court exclude time under the Speedy Trial Act up to the date of the next scheduled conference. 18 U.S.C. § 3161(h)(7). Exclusion of time is warranted given that there are pending motions before the Court, and that additional time will facilitate the contemplation of any pre-trial dispositions.

[Continued]

Hon. Andrew L. Carter, Jr.  
February 3, 2021

Page 2

Wherefore, the Government respectfully requests a thirty-day adjournment and exclusion of time.

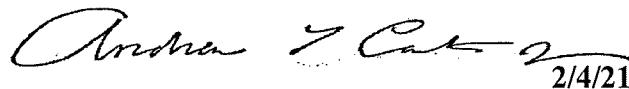
Respectfully submitted,

AUDREY STRAUSS  
United States Attorney for the  
Southern District of New York

By: /s/  
Sarah Mortazavi  
Jacob Gutwillig  
Assistant United States Attorneys  
(212) 637-2520/2215

cc: All Counsel via ECF

**The application is GRANTED. Status conference adjourned to  
3/5/21 at 12 p.m. Time excluded.  
So Ordered.**



2/4/21